

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION

This Document Relates to: ALL CASES

Master Case No. 2:09-cv-00037-MJP

**SUPPLEMENTAL DECLARATION
OF KENNETH M. REHNS
SUBMITTED IN ACCORDANCE
WITH THE COURT'S SEPTEMBER
21 ORDER**

ECF CASE

I, Kenneth M. Rehns, an attorney duly admitted to practice law before the courts of the State of New York and admitted *pro hac vice* to this Court, declare, under the penalty of perjury, as follows:

1. I am an Associate with the law firm of Cohen Milstein Sellers & Toll PLLC, co-lead counsel and attorneys for Boilermakers National Annuity Trust ("BNAT" or "Plaintiff"). I am fully familiar with the facts and circumstances herein. I submit this Supplemental Certification in accordance with the Court's September 21, 2011 Order granting Defendants' Motion to Compel (the "Order").

2. Plaintiff and Plaintiff's counsel have now completed the search and review of

1 more than 45,000 pages of potentially responsive documents from BNAT's network and
 2 electronic files. Because of the technical difficulties described more fully in the declaration
 3 filed on Monday, October 3, 2011, this search was not completed until Tuesday, October 4,
 4 2011. At that point, Plaintiff began providing the documents found in the search to counsel
 5 for review. The review for responsiveness and privilege of the full set of search results took
 6 four days to complete.

7 3. On October 7, 2011, Plaintiff produced 62 documents totaling more than
 8 2,600 pages. As a result, all responsive documents found in the search of BNAT's records
 9 and files have now been produced to Defendants. Plaintiff certifies that no documents exist
 10 for the following requests for production, 2, 3, 6-11, 15, 21, 24, 26-27, 29-34 and 42.

11
 12 Dated: October 10, 2011 at New York, New York.

13 COHEN MILSTEIN SELLERS & TOLL PLLC

14
 15 By: /s/ Kenneth M. Rehns

Kenneth M. Rehns (*admitted pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record and additional persons listed below:

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SUPPLEMENTAL DECLARATION OF KENNETH M. REHNS
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(NO. 2:09-CV-0037-MJP) - 3
4898/001/248304.1

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17 Dated October 10, 2011.

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